

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

V.

HOLLY SADOWSKI

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CRIMINAL NUMBER 24-204-1

ORDER

AND NOW, this day of , 2025, upon consideration of the Defendant's Unopposed Motion for Continuance of Trial, it is hereby **ORDERED** that the motion is **GRANTED**. The Court finds that the parties need additional time to determine whether a non-trial disposition can be negotiated and if not, the defense needs more time to prepare for trial. Pursuant to 18 U.S.C. § 3161(h)(7)(A), the Court finds that the ends of justice served by the continuance outweigh the best interest of the public and the defendant in a speedy trial.

Trial in this matter shall begin on the day of , 2025.

BY THE COURT:

THE HONORABLE MITCHELL S. GOLDBERG
Chief United States District Court Judge

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DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE OF TRIAL

Holly Sadowski, by her counsel undersigned, respectfully requests a continuance of trial in this case. In support of this request, it is stated:

1. On September 12, 2024, Ms. Sadowski was arraigned before the Honorable Craig M. Straw and entered a plea of not guilty to the instant indictment.

2. The trial is scheduled to begin on June 16, 2025.

3. The defense has received discovery in this case. Defense counsel respectfully requests additional time to review the discovery materials with Ms. Sadowski, conduct any necessary investigation and legal research, determine if a non-trial disposition is possible, and otherwise prepare for trial. A continuance of not less than ninety (90) days is respectfully requested.

4. Under the Speedy Trial Act, Title 18 U.S.C. § 3161(h)(7)(A), (B) and (C), the period of delay resulting from a continuance is excludable where granting the continuance serves the ends of justice and outweighs the best interest of the public and the defendant in a speedy trial.

5. Failure to grant this request for a continuance would result in a miscarriage of justice, 18 U.S.C. § 3161(h)(7)(B)(I).

6. Failure to grant the continuance would deny counsel for the defendant the

reasonable time necessary for preparing effectively to represent this defendant in this matter.

7. Failure to grant this continuance will also deny counsel for the defendant the opportunity to explore a non-trial disposition of this matter with the government.

8. Defense counsel and Ms. Sadowski have discussed this motion, and Ms. Sadowski agrees that more time is necessary. A Speedy Trial Waiver signed by the defendant is forthcoming.

9. Laura Bradbury, Special Assistant United States Attorney has no objection to this continuance motion.

10. Defense counsel stipulates that the time from the filing of this motion until the trial date is excludable time pursuant to 18 U.S.C. § 3161(h)(7)(A).

WHEREFORE, for the foregoing reasons, the defense respectfully requests that this motion be granted.

Respectfully submitted,

/s/ Jeremy Isard
JEREMY ISARD
Assistant Federal Defender

CERTIFICATE OF SERVICE

I, Jeremy Isard, Assistant Federal Defender, Federal Community Defender Office for the Eastern District of Pennsylvania, hereby certify that I filed the attached Defendant's Unopposed Motion for Continuance of Trial via the Court's Electronic Filing (ECF) system, which sent notification to Laura Bradbury, Special Assistant United States Attorney, office located at 615 Chestnut Street, Suite 1250, Philadelphia, Pennsylvania 19106, via her email address.

/s/ Jeremy Isard
JEREMY ISARD
Assistant Federal Defender

DATE: May 27, 2025